

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE RESCAP LIQUIDATING TRUST
MORTGAGE PURCHASE LITIGATION

This document relates to:

Residential Funding Co. v. HSBC Mortg.
Corp. (USA), Adv. Proc. No. 14-01915 (MG)

Residential Funding Co. v. UBS Real Estate
Secs., Inc., Adv. Proc. No. 14-01926 (MG)

ResCap Liquidating Trust v. Summit Fin.
Mortg. LLC, Adv. Proc. No. 14-01996 (MG)

ResCap Liquidating Trust v. Mortg. Investors
Grp., Inc., Adv. Proc. No. 14-02004 (MG)

Residential Funding Co. v. SunTrust Mortg.
Inc., Adv. Proc. No. 13-1820 (MG)

Case No. 12-12020 (MG) (Ch. 11)
Adv. Proc. No. 14-07900 (MG)

**DEFENDANTS' PRELIMINARY LIST
OF CURRENT AND FORMER RFC
EMPLOYEES AND THIRD PARTY
WITNESSES AS TO WHICH
DEFENDANTS SEEK DEPOSITION
TESTIMONY IN AN INDIVIDUAL
CAPACITY ON COMMON ISSUES**

Pursuant to Section 4c.5 of Case Management and Scheduling Order #4 (the “CMO”), Defendants in the above-listed actions identify below a preliminary list of current and former RFC employees and third party witnesses as to which the Defendants seek deposition testimony in any individual (i.e., non-30(b)(6)) capacity on common issues.

Under Section 4b.2 of the CMO, “[d]ocument productions of the parties shall be substantially completed no later than June 15, 2015, unless extended by the Court upon a demonstration of good cause.” Despite repeated requests from Defendants, Plaintiff has not confirmed whether it has complied with this requirement. Moreover, Plaintiff has represented in related actions it is pursuing against correspondent lenders in the United States District Court for the District of Minnesota that it does not anticipate substantially completing its document production for any custodians until the end of August, and that for certain custodians Plaintiff expects to be substantially complete no earlier than November.

Accordingly, Defendants reserve the right to make any modifications to the list below for any reason, including based on Plaintiff’s failure to substantially complete its document production for any of the agreed custodians.

Current or Former RFC Employees

Allen, Susan
Anderson, Jennifer
Berman, Cathy
Bonine, Wes
Cancelliere, Jeff
Casale, Debbie
Cleary, Bill
Collins, John
Dallman, Judy
Duncan, Sandra
Farkas, Teresa
Fenton, Neil
Friedline, Anne

Gallagher, Megan
George, Darrin
Girdler, Diane
Hamzehpour, Tammy
Hellams, Danny
Herfurth, Mary
Hessel, Julie
Horseman, Terry
Horst (Keith), Deanna
Jacobsohn, Lee
Johnson, Melanie
Kruger, Lewis
Lamar, Travis
Latzka, Jennifer
Lenicheck, Joyce
Lundsten, Lisa
Mand, Michael
Marano, Thomas
Maze, Brenda
McGown, Karen
McLane, Michele
Meyerhofer, Jeff
Pawlyshyn, Steve
Peterson, Carol
Ruckdaschel, John
Russell, Don
Sarkis, Nancy
Scholtz, Eric
Schroer, Dan
Siats, Ward
Stever, Cheryl
Thompson, Will
Whealdon, Dorian
Whitlinger, Jim
Wold, Mark

Third-Parties

AIG Asset Management (U.S.), LLC
Allstate Insurance Company
Ally Financial, Inc. (and related entities)
Amherst Advisory & Management, LLC
Analytic Focus LLC
Banc of America Securities LLC
Bank of New York Mellon (and related entities)
Brown, C.J.

Centerview Partners, LLC
Chopra, Karn
Citigroup Inc.
Clayton Holdings, LLC
Coherent Economics, LLC
Cornell, Bradford
Covius, LLC
Credit Suisse Group AG
Deutsche Bank AG
Devine, Tim
Dubel, John
Duff & Phelps, LLC
Federal Housing Finance Agency
Financial Guaranty Insurance Company
FTI Consulting, Inc.
Gibbs & Bruns, LLC
Goldman Sachs Group, Inc.
JPMorgan Chase & Company (and related entities)
Lee, Gary
Lehman Brothers Holdings Inc.
Lipps, Jeffrey
Mack, John
Massachusetts Mutual Life Insurance Company
MBIA Insurance Corp.
Merrill Lynch & Co., Inc.
Morgan Stanley & Co., Inc.
Morrow, J.F.
New Jersey Carpenters Funds
Ocwen Loan Servicing, LLC
Opus Capital Markets Consultants, LLC
Patrick, Kathy
Pfeiffer, Alan
Puntus, Marc
R.R. Donnelly & Sons Company
Renzi, Mark
Royal Bank of Scotland, PLC (and related entities)
Salomon Smith Barney
Schipper, Katherine
Sillman, Frank
Talcott Franklin P.C.
The Bohan Group, Inc.
The Prudential Insurance Company of America (and related entities)
U.S. Bank National Association

Dated: July 1, 2015

/s/ R. Hackney Wiegmann

R. Hackney Wiegmann (hwiegmann@wc.com)
Andrew W. Rudge (arudge@wc.com)
Matthew V. Johnson (mjohnson@wc.com)
Jesse Smallwood (jsmallwood@wc.com)
Mahmood Ahmad (mahmad@wc.com)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
(202) 434-5000
(202) 434-5029 (fax)

Attorneys for Defendant HSBC Mortgage Corp. (USA)

/s/ Cameron S. Matheson

James A. Murphy (jmurphy@mmlawus.com)
Cameron S. Matheson (cmatheson@mmlawus.com)
Theodore R. Snyder (tsnyder@mmlawus.com)
MURPHY & MCGONIGLE, PC
1185 Avenue of the Americas
21st Floor
New York, NY 10036
(212) 880-9999

*Attorneys for Defendants Summit Financial Mortgage
LLC and Summit Community Bank, Inc.*

/s/ Robert A. Fumerton

Robert A. Fumerton (robert.fumerton@skadden.com)
Alexander C. Drylewski
(alexander.drylewski@skadden.com)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036
(212) 735-3000
(212) 735-2000 (fax)

Attorneys for Defendant UBS Real Estate Securities Inc.

/s/ John Doherty

John P. Doherty (john.doherty@alston.com)
Jennifer Susan Kozar
(jennifer.kozar@alston.com)
James S. D'Ambra, Jr.
(jamesdambra@alston.com)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
(212) 210-9400
(212) 210-9444 (fax)

*Attorneys for Defendant SunTrust Mortgage,
Inc.*

/s/ Roland P. Reynolds

Roland P. Reynolds
(rreynolds@pldlawyers.com)
PALMER, LOMBARDI & DONOHUE, LLP
515 South Flower Street
Suite 2100
Los Angeles, CA 90071
(213) 688-0430
(213) 688-0440 (fax)

*Attorney for Defendant Mortgage Investors
Group, a general partnership*